

THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

DEBORAH S. SKEANS, Executrix of  
the ESTATE OF FRANK E. PAVLIS,

Plaintiff,

v.

KEY COMMERCIAL FINANCE, LLC,  
KEY COMMERCIAL FINANCE  
PROPERTIES, LLC, EQUITY PROS,  
LLC, and MOBILE AGENCY, LLC

Defendants.

No. 1:18-cv-01516-CFC-MPT

**CONSENT JUDGMENT**

Plaintiff, Deborah S. Skeans, Executrix of the Estate of Frank E. Pavlis (“Plaintiff”), and Defendants Key Commercial Finance, LLC, Key Commercial Finance Properties, LLC, Equity Pros, LLC and Mobile Agency, LLC (“Defendants,” and together with Plaintiff, the “Parties”), hereby stipulate and agree to the entry of full and final JUDGMENT on Count I of the Supplemental Complaint, and the entry of JUDGMENT in favor of Plaintiff and against Defendants Key Commercial Finance, LLC, Key Commercial Finance Properties, LLC, Equity Pros, LLC and Mobile Agency, LLC, jointly and severally in the amount of \$7,000,000. The Parties further stipulate and agree to the DISMISSAL WITH PREJUDICE of Counts II, III, IV, and V of the Supplemental Complaint.

[Signatures on next page.]

**Deborah S. Skeans, Executrix of the Estate of Frank E. Pavlis**

*/s/ Deborah S. Skeans Executrix*

Name: Deborah S. Skeans

Date: 4/22/22

**Key Commercial Finance, LLC**

*/s/ G. Chadwick Self*

Name: G. Chadwick Self

Title: Authorized Representative

Date: 4/22/2022

**Equity Pros, LLC**

*/s/ G. Chadwick Self*

Name: G. Chadwick Self

Title: Authorized Representative

Date: 4/22/2022

**Key Commercial Finance Properties, LLC**

*/s/ G. Chadwick Self*

Name: G. Chadwick Self

Title: Authorized Representative

Date: 4/22/2022

**Mobile Agency, LLC**

*/s/ G. Chadwick Self*

Name: G. Chadwick Self

Title: Authorized Representative

Date: 4/22/2022

**SO ORDERED:**

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Chief Judge Colm F. Connolly  
U.S. District Court Judge